

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MAGGIE LAWRENCE,)	
)	
Plaintiff,)	
)	Case No. 3:22-0680
v.)	District Judge Campbell
)	Magistrate Judge Holmes
METROPOLITAN GOVERNMENT OF)	
NASHVILLE & DAVIDSON COUNTY,)	
)	
Defendant.		

JOINT STATUS REPORT

Pursuant to this Court's Initial Case Management Order (Docket No. 14), the parties hereby submit their Joint Status Report:

(i) Fact Discovery: The parties have exchanged voluminous discovery via Initial Disclosures. The parties have agreed to a one week extension for Plaintiff to respond to Defendant's First Discovery Requests, so Plaintiff's responses to Defendant's discovery requests are now due by Friday, March 24, 2023. Plaintiff anticipates deposing the following witnesses: Al Thomas; Lawrence Hutchison Jr.; Chief William Swann and a 30(b)(6) witness (if not one of the aforementioned witnesses). These depositions have not yet been scheduled, but the parties believe that they could be completed by the end of April. Defendant at this point does not believe that it will need to take any depositions.

(ii) Attempts at Resolution: The parties are currently in the process of scheduling mediation. To date, the parties have agreed to use Michael Russell as a mediator and are trying to schedule a date for the mediation.

(iii) Matters Requiring the Court's Attention: None to date.

(iv) Any other Case Management Issues for the Court's Attention: None to date.

The case is on track according to the case management schedule and no further assistance from the Court is needed at this time.

Respectfully submitted,

s/ Robert C. Bigelow, Esq.
Robert C. Bigelow # 022022
Bigelow Legal, PLLC
4235 Hillsboro Pike, Suite 301
Nashville, Tennessee 37215
rbigelow@bigelowlegal.com
(615) 829-8986

Attorney for Plaintiff

s/ J. Brooks Fox, Esq. (w/ permission)
J. Brooks Fox, # 16096
Benjamin A. Puckett, # 40042
Metropolitan Courthouse, Suite 108
P.O. Box 196300
Nashville, Tennessee 37219-6300
(615) 862-6375

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2023, a copy of the foregoing was filed electronically with the court's e-filing system. Notice shall be provided to all parties of record:

J. Brooks Fox, # 16096
Brook.fox@nashville.gov
Benjamin A. Puckett, # 40042
Benjamin.puckett@nashville.gov
Metropolitan Courthouse, Suite 108
P.O. Box 196300
Nashville, Tennessee 37219-6300
(615) 862-6375

Attorneys for Defendant

s/ Robert C. Bigelow, Esq.
Robert C. Bigelow